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5 Attorneys for the Plaintiffs' Executive Committee appointed by the Superior Court of the State  
6 of California, in and for the County of Alameda, in Case No. RG16843631 and related cases.

7 THE UNITED STATES BANKRUPTCY COURT  
8 IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA  
9 SAN FRANCISCO DIVISION

10 In re:

11 **PG&E CORPORATION,**

12 -and-

13 In re:

14 **PACIFIC GAS AND ELECTRIC**  
15 **COMPANY,**

16 Debtors.

☐

17 ☐ Affects PG&E Corporation

Affects Pacific Gas and Electric

18 ☒ Company

Affects both Debtors

19 \* All papers shall be filed in the lead case,  
20 No. 19-30088(DM)

Case Nos. 19-30088 (DM)

Chapter 11

**MOTION FOR RELIEF FROM AUTOMATIC  
STAY TO PERMIT THE COURTS OF THE  
STATE OF CALIFORNIA TO CONDUCT A  
JURY TRIAL AND RELATED PRETRIAL  
AND POST TRIAL MATTERS IN  
CONNECTION WITH THE GHOST SHIP  
FIRE CASES**

DATE: December 17, 2019

TIME: 10:00 a.m.

PLACE: Courtroom 17  
450 Golden Gate Avenue,  
16<sup>th</sup> Fl.  
San Francisco, California

JUDGE: Hon. Dennis Montali

**OBJECTION DEADLINE: December 12,  
2019 (4:00 P.M. Prevailing Pacific Time)**

23  
24 TO: DEBTORS; THE UNITED STATES TRUSTEE; CREDITORS; OTHER  
25 PARTIES IN INTEREST; AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

26 The Plaintiffs' Executive Committee appointed by the Superior Court of the State of  
27 California, in and for the County of Alameda, in Case No. RG16843631 and related cases  
28 (the "Ghost Ship Executive Committee") hereby respectfully submits this Motion for Relief

1 from the Automatic Stay to Permit the Courts of the State of California to Conduct a Jury  
2 Trial and Related Pretrial and Post Trial Matters in Connection with the Ghost Ship Fire  
3 Cases (the "Motion") pursuant to 11 U.S.C. Section 362(d)(1), for cause.

4 The Motion seeks the entry of an order granting relief from the automatic stay to  
5 allow the Ghost Ship Plaintiffs to proceed on their wrongful death, survival, personal injury,  
6 and related property damage claims (collectively the "Ghost Ship Litigation") against PG&E  
7 Corporation and Pacific Gas and Electric Company (collectively the "Debtors"), arising from  
8 the fire which occurred on December 2, 2016, at the real property located on 31st Avenue  
9 in the City of Oakland, County of Alameda, State of California, bearing Assessor's Parcels  
10 Numbers 25-690-10 and 25-690-11, which is commonly referred to as the "Ghost Ship."  
11 The fire is commonly referred to as the "Ghost Ship Fire."

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13 The Motion seeks an order to allow the Ghost Ship Litigation to proceed against the  
14 Debtors, in order to establish the liability of the Debtors, obtain judgment(s) against the  
15 Debtors, and collect any judgment(s) obtained against the Debtors to the extent of  
16 available insurance proceeds.

17 The Motion does not seek relief from the automatic stay to collect any judgment(s)  
18 obtained directly against the Debtors, without further order of this Court.

19  
20 Dated: November 26, 2019

Respectfully submitted,  
21 PINO & ASSOCIATES

22 By: /s/ Estela O. Pino  
23 Plaintiffs' Executive Committee appointed by  
24 the Superior Court of the State of California, in  
25 and for the County of Alameda, in Case No.  
26 RG16843631 and related cases.  
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